BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service   )   Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-68-74)
October 14, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby
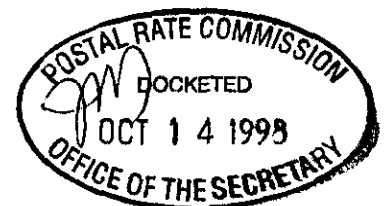
incorporated by reference.

Respectfully submitted,

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss
Attorney

OCA/USPS-T3-68. Witness Garvey testifies in USPS-T-1 at 3 that the Postal Service

will accept Portable Document Format (PDF) from customers (n. 3) and will use PDF to

transmit electronic document files from the mail processing center to digital printers

(lines 4-5).

Please review the document properties of a PDF file entitled "Flier", included on

a diskette filed by OCA as OCA-LR-1, MC98-1. (A copy of the OCA-LR-1 diskette was

submitted to the Postal Service for your review.) The file is a simulation of a flier that a

veterinarian might send to a customer, by means of Mailing Online (MOL), to remind the

customer that a pet is due for an appointment. A hard copy of the simulated notice

generated by the PDF file in Acrobat Reader has been attached as Attachment 1.

a.   Please confirm that this type of file would be acceptable for MOL (or redirect this

       interrogatory to a witness who is able to confirm or deny).

b.   If you are able to confirm that the file is acceptable for MOL, then review the

       number of bytes required to create the image and text of the submitted notice.

       Isn't it correct that this file is approximately 358 kilobytes (KB) in size?

c.   If you are not able to confirm that the file is acceptable for MOL, then explain

       why it is not acceptable (or redirect this question to a witness who is able to

       provide the explanation).

d.   Isn't it correct that you have assumed that customers accessing MOL would

       typically submit word processing/desk top publishing documents whose

       electronic pages would be 5.02KB per page in size (USPS-LR-1/MC98-1 at 6)?

e.   If part b. was answered in the affirmative, i.e., that the 358 KB PDF file is

       acceptable for MOL, then explain how you have taken into account the very

large number of bytes consumed by a file such as the "Flier" file in estimating the

capacity requirements for the "Telecommunications Internet Connection,

Customers Accessing Mailing Online."

f.   Isn't it correct that, in the note explaining your choice of 5.02 KB as the average

number of bytes per electronic page, you have limited your discussion to an

observation concerning a Microsoft Word file containing several paragraphs of

plain text and noted that such a file consisting of several paragraphs could

require up to 10 KB?

g.   What were your specific assumptions about desktop publishing file size?

h.   Haven't you seriously underestimated the capacity required for a range of

graphics-intensive and desktop publishing documents? Explain your answer.

OCA/USPS-T3-69. Please review a second file, entitled "One_Word_File," which

consists of the single word "Postal" and which has been copied onto the OCA-LR-1

diskette. (Hard copy has been attached as Attachment 2).

a.   Isn't it correct that this Microsoft Word document is 11KB in size?

b.   Isn't it correct that this 11KB size is more than twice the amount per page you

assumed at page 6 of Attachment 1?

c.   How have you taken such a one-word, one-page document of 11KB explicitly

into account? Please explain your answer.

OCA/USPS-T3-70. Please define an electronic "page" as you have used that term in USPS-LR-1/MC98-1 at 6. Did you assume that the bytes of information contained on such a page would result in

a. 1

b. 2

c. 3

d. or 4 impressions? Please explain.

OCA/USPS-T3-71. Please refer to USPS-LR-1/MC98-1, Attachment 1 at 6, at the line that reads "Number of Bytes Per Page Word Processing/Desk Top Publishing."

a.   Please confirm that the number 5,020, "Number of Bytes Per Page Word Processing/Desk Top Publishing," is based upon the assumption that files consist only of plain text, and do not include the presence of graphics. If you do not confirm, please explain.

b.   Please confirm that there is no limitation on the size (in bytes) of files accepted from customers by Mailing Online (as long as the page limitation is not exceeded). If you are unable to confirm, then provide an explanation or redirect the question to a witness who can provide the explanation.

OCA/USPS-T3-72. Please refer to USPS-LR-1/MC98-1, Attachment 1 at 7.

a.   Please confirm that Mailing Online will accept files from customers in PDF and Postscript format. If you do not confirm, please explain.

b.   Please confirm that the San Mateo processing center processes files received

        from customers in PDF format. If you do not confirm, please explain.

c.   Please confirm that the San Mateo processing center transmits all print jobs to

        the print site in Postscript format. If you do not confirm, please explain.

d.   Please identify at what point in processing by the San Mateo processing center

        customer files will be converted from PDF format to Postscript.

e.   Please confirm that the print sites will receive and process the print jobs received

        from the San Mateo processing center in Postscript format. If you do not

        confirm, please explain.

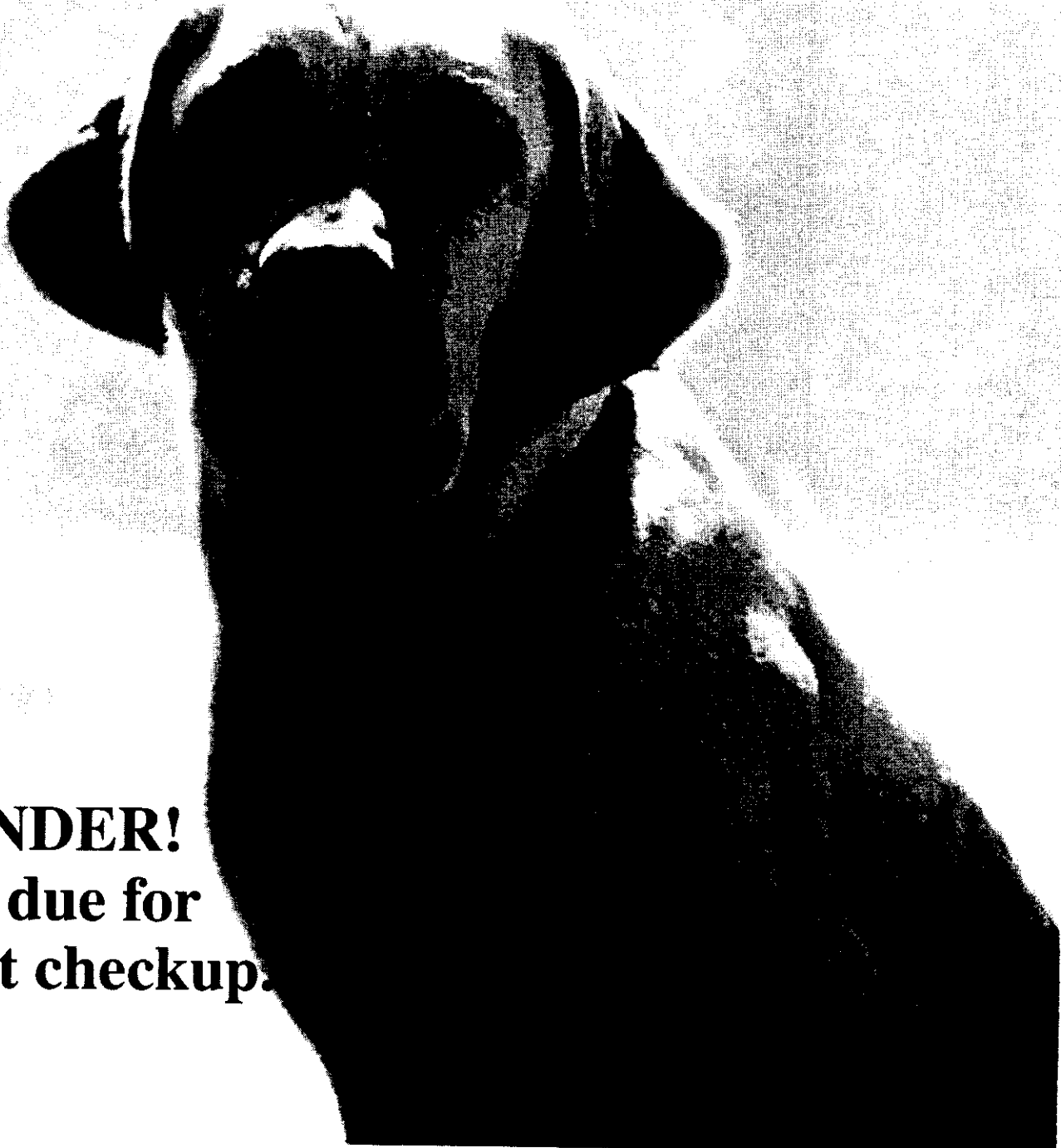OCA/USPS-T3-73. Please refer to USPS-LR-1/MC98-1, Attachment 1 at 7.

a.   Please identify at what point in processing by the San Mateo processing center

        print jobs will be compressed for transmission to the print sites.

b.   Please confirm that the San Mateo processing center only compresses files for

        the purpose of transmitting print jobs to print sites. If you do not confirm, please

        explain.

OCA/USPS-T3-74. Please refer to USPS-LR-1/MC98-1, Attachment 1 at 7, at the line

reading "Average Bytes Per Page in Postscript format." In the "SOURCE" column it

states, "Estimate based on observation of the file sizes generated by the Mailing Online

software during the pilot."

a.   How many observations of file sizes were made during the pilot?

b.   Please describe the process of observation and identify the Postal employees or

        other personnel who made the observations.

c.   Please confirm that the observation of files did not constitute a random sample.

        If you do not confirm, please explain.

d.   Please confirm that the figure 30,720, "Average Bytes Per Page in Postscript

        format," does not constitute a sample mean ($\bar{x}$) or population mean (μ). If you

        do not confirm, please explain.

e.   Please provide a tabulation showing the total number of files processed during

        the pilot by the number of pages and byte size in Postscript format.
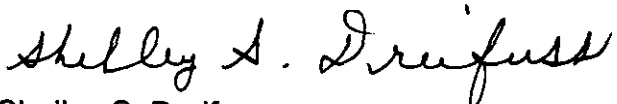
Dr. John Doe's
Veterinary Services

REMINDER!
Fido is due for
his next checkup.

Postal

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the rules of

practice.

Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
October 14, 1998